

In the United States District Court
for the Southern District of Texas
Houston Division

Joshua D. Zollicoffer; a.k.a. Passion Star,	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 4:14-cv-03037
	§	
Brad Livingston, et al.	§	
Defendants.	§	Jury

**Second Joint Motion to Extend Stay of the
Proceeding Pending Finalization of a Settlement Package**

Plaintiff and Defendants ask the Court to extend the stay previously issued by the Court another 90 days as the settlement is not yet completed and additional time is needed.

1. Since the Court issued its March 1, 2017 order staying the proceedings, the parties have continued working on finalizing the terms of a settlement agreement.
2. The parties are working diligently to reach a final agreement, but do not anticipate completing that process before the end of the current stay on July 17, 2017 [D.E. 94]. The policy changes require extensive review by the Plaintiff and TDCJ. The process of approving policy changes has been delayed in part by TDCJ authorities being involved in the Texas legislative session and the substitution of counsel for the Defendants. In addition, the payment of the monetary settlement requires the approval of multiple agencies, including the Attorney General, the Governor, and the Comptroller.
3. Therefore, the parties ask the Court to extend the current stay for an additional ninety days in order to allow for finalization of a settlement agreement.
4. The parties hope that no further extensions will be necessary and thank the Court for its patience.

Respectfully submitted,

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Notice of Electronic Filing

I, Seth Byron Dennis, Assistant Attorney General of Texas, do hereby certify that I have electronically submitted for filing, a true and correct copy of the above and foregoing **Second Joint Motion to Extend Stay of the Proceeding Pending Finalization of a Settlement Package** in accordance with the Electronic Case Files System of the Southern District of Texas, on this the 11th day of July, 2017.

/s/ Seth Byron Dennis

SETH BYRON DENNIS

Assistant Attorney General

Certificate of Service

I, Seth Byron Dennis, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the above and foregoing **Second Joint Motion to Extend Stay of the Proceeding Pending Finalization of a Settlement Package** has been served by means of the Southern District of Texas's CM/ECF filing system, in accordance with the Federal Rules of Civil Procedure on this the 11th day of July, 2017, addressed to all parties of record.

/s/ Seth Byron Dennis

SETH BYRON DENNIS

Assistant Attorney General

